

# PAUL HASTINGS

1(212) 318-6626  
jamesbliss@paulhastings.com

August 5, 2020

**VIA ECF AND ELECTRONIC MAIL**

The Honorable Katherine Polk Failla  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Petróleos de Venezuela, et al. v. MUFG Union Bank, N.A., et. al.*, Case No. 1:19-cv-10023-KPF  
(S.D.N.Y.)

Dear Judge Failla:

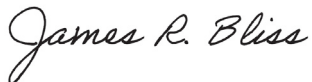
We write regarding the Court's July 29, 2020 order scheduling oral argument in this matter for September 22, 2020.

Unfortunately, counsel who will be arguing for PDV Holding has a long-scheduled argument before the D.C. Circuit on that date, and counsel for PDVSA and PDVSA Petróleo have a long-scheduled mediation the next day.

Plaintiffs respectfully request that oral argument be rescheduled for September 25, September 29, or September 30, whichever is the earliest convenient date for the Court. If none of these dates is convenient for the Court, the parties will promptly confer and propose other alternative dates.

The Trustee and the Collateral Agent consent to this request and respectfully join plaintiffs' request that oral argument be rescheduled for the earliest date that is convenient for the Court.

Respectfully,



James R. Bliss  
of PAUL HASTINGS LLP

cc: Counsel of record

Application GRANTED. Oral argument is ADJOURNED to September 25, 2020, at 2:00 p.m. The Court will provide instructions for remote access to the argument as the date approaches.

Dated: August 6, 2020  
New York, New York

SO ORDERED.



Paul Hastings LLP | 200 Park Avenue | New York, NY 10166  
HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE